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**VIA ECF**

The Honorable Martin Glenn  
Chief Bankruptcy Judge  
United States Bankruptcy Court  
One Bowling Green  
New York, NY 10004  
mg.chambers@nysb.uscourts.gov

Re: In re Celsius Network LLC, et al, Case No. 22-10964 (MG) - Request to Make  
Closing Argument

Dear Chief Judge Glenn:

Venable LLP is counsel to Ignat Tuganov, a creditor of the above-referenced debtors and debtors-in-possession (collectively, the “Debtors”) and a party to the Debtors’ Plan Support Agreement, dated as of September 20, 2023. Pursuant to this Court’s *Order Establishing Deadlines and Procedures for Closing Arguments* [Docket. No. 3851] and the *Order Clarifying Case Management Procedures for Closing Arguments (Modification #1)* [Docket No. 3879], Mr. Tuganov, by and through his counsel, requests leave for Venable LLP to make a Closing Argument at the Confirmation Hearing in support of the *Modified Joint Chapter 11 Plan of Reorganization of Celsius Network LLC And Its Affiliates* [Dkt. No. 3577]. Mr. Tuganov estimates that his counsel’s Closing Argument will last no longer than then (10) minutes.

Sincerely,

/s/ Jeffrey S. Sabin  
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*Counsel to Ignat Tuganov*